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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 4 (b))

GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Physical hazards

Solutions of Solids Flammable Solids and Self Reactive Substances which do not meet the Classification Criteria of Class 4 Substances

Implementation of Agenda 21
Classification of Reactive Substances

Transmitted by the Observer from New Zealand

Introduction

At the thirteenth session of the Sub-Committee New Zealand present an informal paper INF.3. This paper outlined a number of concerns relating to the classification of Flammable and Reactive Substances in the proposed Globally Harmonized System. During the Working Group meeting, New Zealand was invited to present formal papers to the fourteenth session of the Sub-Committee.

New Zealand is currently developing Regulations for the Hazardous Substances and New Organisms (HSNO) Act. This Act implements the concepts and philosophy of the Globally Harmonized Chemical Classification System to New Zealand's Domestic Legislation. While developing these Regulations, we discovered some serious problems in applying the current UN transport classification criteria to the controls needed for worker, consumer and environmental safety. The difficulty arises from the UN transport classification's use of packaging to modify the risk.

New Zealand's Position re the Globally Harmonized Classification System

New Zealand strongly supports the creation of a Globally Harmonized Chemical Classification System. We also strongly support the Terms of Reference of the CG/HCCS. Our position is stated in ST/SG/AC.10/C.3/1997/68. This position is the same as the position presented in INF.3 at the thirteenth session on the Sub-Committee.

Proposal

It is proposed that the Working Group adopt a GHS classification category for volatile liquid solutions that contain a substance which satisfies the test for a solid Flammable Solids or Self Reactive Substances, but the solution does not meet the classification criteria of any Division of Class 4. This classification would not apply to transport.. This can be represented diagramatically as follows.

(a) **(b)**	**UN Recommendations TDG** **And Globally Harmonised System**
(c) **(d)** (e)	**Globally Harmonised System** Allows for controls in non transport sectors. Occupational, public and environmental safety
(f)	**No Controls Required**

Justification

This proposal is intended to address the potential for the volatile liquid to evaporate in the event of a leak or accidental spill. This would eventually lead to the reformation of a flammable solid or self reactive substance. This risk is not significant during transport but is relevant to longer term storage.

The Globally Harmonised System is to take account of risks in all parts of a product's lifecycle. Storage risks are relevant and should be included in the harmonised system.

What we are proposing is the inclusion of Box 2 labelled "Globally Harmonised System". This is similar to the extra level included for flammable liquids. We again stress this additional level of possible control would not apply to transport but may apply to parts of cycle covering worker safety, storage, public safety and the environment.

Recommendation

That the Working Group insert an additional hazard level as proposed to address safety in non-transport parts of the lifecycle of these substances.